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7 *Joyce Sirianni and Lisa M. Lee*  
8 *as Special Administrator of the*  
8 *Estate of Demetrios A. Dalacas*

9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF NEVADA**

13 ALLIED WORLD SPECIALTY INSURANCE  
14 COMPANY f/k/a DARWIN NATIONAL  
15 ASSURANCE COMPANY and ALLIED  
16 WORLD INSURANCE COMPANY,

17 Plaintiffs,  
18  
19 vs.

20 LISA M. LEE, as Special Administrator of the  
21 ESTATE OF DEMETRIOS A. DALACAS,  
22 ESQ., ROBERT O McMASTER, as Special  
23 Administrator of the ESTATE OF  
24 DEMETRIOS A. DALACAS, ESQ.,  
25 DEMETRIOS A. DALACAS, ESQ., P.C., a  
26 Nevada professional corporation; JOYCE  
27 Sirianni, and RYAN MCCLARAN,

28 Defendants.

CASE NO.: 2:21-cv-00078-JCM-EJY

**JOINT MOTION FOR**  
**EXTENSION OF TIME FOR**  
**DEFENDANTS JOYCE SIRIANNI**  
**AND LISA M. LEE, AS SPECIAL**  
**ADMINISTRATOR OF THE**  
**ESTATE OF DEMETRIOS A.**  
**DALACAS TO FILE THEIR**  
**RESPONSIVE PLEADING TO**  
**PLAINTIFFS' COMPLAINT FOR**  
**DECLARATORY JUDGMENT**  
**AND MONEY JUDGMENT**

**(Second Request)**

24 Plaintiffs Allied World Specialty Insurance Company f/k/a Darwin National  
25 Assurance Company and Allied World Insurance Company (“Plaintiffs”) and Defendants  
26 Joyce Sirianni and Lisa M. Lee, as Special Administrator of the Estate of Demetrios A.  
27 Dalacas (“Defendants”) hereby file their *Joint Motion for Extension of Time for*  
28 *Defendants Joyce Sirianni and Lisa M. Lee, as Special Administrator of the Estate of*



1 *Demetrios A. Dalacas* to file their Responsive Pleading to Plaintiffs' Complaint for  
 2 Declaratory Relief and Monetary Judgment. Plaintiffs and Defendants jointly and  
 3 respectfully request this Court to extend the deadline for Defendants to file their  
 4 responsive pleading to Plaintiffs' Complaint for Declaratory Judgment and Money  
 5 Judgment twenty-one (21) days from Friday, April 16, 2021 to Friday, May 7, 2021. This  
 6 is Defendants' second request for extension of time to file their responsive pleading.  
 7 Plaintiffs and Defendants hereby submit this joint motion in accordance with LR 7-1.

8 Over the course of the last several weeks, Defendants' undersigned counsel has  
 9 spent a significant amount of time preparing a substantive mediation brief for a complex  
 10 insurance bad faith matter, *Volungis, et al. v. Liberty Mutual Fire Insurance Company*,  
 11 Case No. 2:17-cv-2247 JCM (VCF). Defendants' undersigned counsel simultaneously  
 12 devoted substantial time preparing a substantive motion for summary judgment  
 13 addressing five (5) distinct issues in a complex insurance bad faith matter, *Arlitz v.*  
 14 *GEICO Casualty Company*, Case No. 2:19-cv-00743-RFB-DJA. During this same time  
 15 period, Defendants' undersigned counsel purchased a home in March and had to address  
 16 several unforeseen issues that arose during escrow that forced him to take some time  
 17 away from the office. This additional extension of time will allow Defendants' counsel  
 18 to prepare a comprehensive responsive pleading fully addressing the allegations set  
 19 forth in Plaintiffs' Complaint for Declaratory Judgment and Money Judgment.

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“When an act may or must be done within a specified time, the court may, for good cause, extend the time . . . .” *Burns v. Davis*, Case No. 2:19-cv-00218-RFB-BNW, 2021 U.S. Dist. LEXIS 3749, at \*7 (D. Nev. Jan. 8, 2021) (quoting Fed. R. Civ. P. 6). Based on the foregoing, Plaintiffs and Defendants jointly and respectfully request this Court to **GRANT** the foregoing Motion and extend the deadline for Defendants to file their responsive pleading to Plaintiffs’ Complaint for Declaratory Judgment and Money Judgment twenty-one (21) days from Friday, April 16, 2021 to Friday, May 7, 2021.

DATED this 16th day of April, 2021.

DATED this 16th day of April, 2021.

# WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

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Administrator of the Estate of Demetrios  
A. Dalacas, Esq.*

**IT IS SO ORDERED.**

**U.S. MAGISTRATE JUDGE**

**Dated: April 16, 2021**